

#1

ORIGINAL

MAR 5 2 16 PM '93

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

VINCENT K. MCMAHON and
LINDA MCMAHON,

v.

GERALDO RIVERA, BROOKE SKULSKI,
TRIBUNE ENTERTAINMENT COMPANY,
THE INVESTIGATIVE NEWS GROUP, INC.,
RITA CHATTERTON, and DAVID SHULTS. :

CIVIL ACTION NO.

393 CV 468

MARCH 5, 1993

TFGD

COMPLAINT

The Plaintiffs, as and for their Complaint against the Defendants, hereby complain and say:

INTRODUCTION

1. This action is brought by Plaintiffs seeking recovery for injuries resulting from Defendants' unlawful conspiracy and tortious acts. In furtherance of this conspiracy, Defendants performed numerous tortious acts with the intent of inflicting severe emotional distress upon Plaintiffs, including the fabrication of a false accusation of rape against Plaintiff Vincent McMahon which was aired on the nation's airwaves. Plaintiff Linda McMahon seeks recovery for damages for the loss of consortium resulting from the injuries that Defendants maliciously and intentionally inflicted upon her husband, Vincent McMahon.

MM

THE PARTIES

2. Plaintiff Vincent K. McMahon ("McMahon"), is an individual citizen and resident of the State of Connecticut. The injuries for which McMahon seeks recovery occurred within the State of Connecticut.

3. Plaintiff Linda McMahon ("Mrs. McMahon"), is an individual citizen and resident of the State of Connecticut. The damages for which Mrs. McMahon seeks recovery occurred within the State of Connecticut.

4. Defendant Geraldo Rivera ("Rivera"), is a television personality who appears on two nationally syndicated tabloid-style television programs known as *Now It Can Be Told* and *The Geraldo Rivera Show*. At all times relevant hereto, *Now It Can Be Told* and *The Geraldo Rivera Show* were broadcasted into the State of Connecticut. Upon information and belief, Rivera is a citizen and resident of the State of New Jersey.

5. Defendant Brooke Skulski ("Skulski"), is the producer of *Now It Can Be Told*. At all times relevant hereto, *Now It Can Be Told* was broadcasted into the State of Connecticut. Skulski and others involved in the production of *Now It Can Be Told* traveled to and engaged in acts in furtherance of the conspiracy alleged herein in Connecticut. Upon information and belief, Skulski is a citizen and resident of the State of New York.

6. Defendant Tribune Entertainment Company ("Tribune"), is a Delaware corporation with its principal place of business located

at Room 1982, 435 North Michigan Avenue, Chicago, Illinois 60611. Tribune is a subsidiary of Tribune Broadcasting Company. Upon information and belief, Tribune is engaged in the business of syndicating and distributing television programs. Tribune is co-owner and distributor of *Now It Can Be Told* and *The Geraldo Rivera Show*.

7. Defendant The Investigative News Group, Inc. ("News Group"), is a New York corporation with its principal place of business at 555 West 57th Street, New York, New York. News Group co-owns the *Now It Can Be Told* and *The Geraldo Rivera Show*. Upon information and belief, Geraldo Rivera owns one hundred percent (100%) of the capital stock of News Group.

8. Defendant Rita Chatterton, a/k/a "Rita Marie" ("Chatterton"), is an individual residing in the State of New York at Hillside Colony Park, 41 Pine Lane, Stillwater, New York 12170. Chatterton appeared on episodes of *Now It Can Be Told* and *The Geraldo Rivera Show*, both of which were broadcasted into the State of Connecticut. Chatterton traveled to and engaged in acts in furtherance of the conspiracy alleged herein in Connecticut. Upon information and belief, Chatterton is a citizen of the State of New York.

9. Defendant David Shults ("Shults"), is an individual maintaining a residence in the State of Connecticut. Upon information and belief, Shults is a citizen of the State of Tennessee.

10. Titan Sports, Inc. ("Titan"), is a Delaware corporation with its principal place of business at 1241 East Main Street, Stamford, Connecticut. McMahon is the sole shareholder of Titan and Mrs. McMahon is a corporate officer of Titan.

11. The principal business of Titan is the promotion of live and televised professional wrestling matches through the auspices of the World Wrestling Federation (the "WWF").

JURISDICTION AND VENUE

12. This Court has jurisdiction over the subject matter of this case by virtue of 28 U.S.C. Section 1332 because all Defendants and all Plaintiffs are citizens of different states, and because the amount in controversy exceeds \$50,000.00, exclusive of interest and costs.

13. Venue is proper in this district by virtue of 28 U.S.C. Section 1391 (a) and (c).

FACTS

14. Chatterton is a former referee with the WWF. In or around 1986, Chatterton was dismissed from the WWF because she was not a competent ring referee and posed a danger to herself in the ring.

15. Shults is a former wrestler with the WWF. In or around 1985, Shults' contractual relationship with Titan was terminated due to his erratic and violent behavior. His erratic behavior included, but was not necessarily limited to, for example, twice

striking John Stossel, a television reporter with ABC News, while Stossel was attempting to interview Shults.

16. Since his termination, Shults has been engaged in one form or another of retaliatory conduct specifically and intentionally aimed at damaging Titan and/or Mr. McMahon.

17. In or around 1988, Shults employed the services of Anthony Toce ("Toce"), a private investigator, for the purpose of attempting to obtain negative information about Mr. McMahon, Titan and/or the WWF. As part of this scheme, Toce conducted a tape recorded interview with Chatterton in or around 1988. Throughout the entire course of this 1988 interview, Chatterton made no allegation of sexual misconduct of any kind against McMahon.

18. In early 1992, Shults reappeared. He granted interviews to members of the tabloid media in which he promised, in general terms, to expose alleged sexual preferences and sexual improprieties of persons affiliated with Titan. In these various appearances, Shults never named names.

19. Shults also entered into an agreement with agents of Rivera, Tribune and/or News Group whereby Shults agreed to provide Rivera and/or Tribune with disparaging information about McMahon, Titan and/or the WWF.

20. In order to perform his end of the bargain, Shults contacted Chatterton in order to induce her to make a false claim that McMahon had raped her while she was still affiliated with the WWF.

21. Chatterton agreed with Shults to falsely accuse McMahon of raping her in 1986 in order that such charges could be made for the first time in the context of the filming and production of the *Now It Can Be Told* program. This was a charge that Chatterton had never made before, which was known by all concerned to be barred by all applicable statutes of limitations, and which was belied by Toce's 1988 interview with Chatterton.

22. Chatterton was promised legal counsel to "represent" her in a contemporaneous attempt to secure money from Mr. McMahon not to air her story. Chatterton agreed to participate in the scheme.

23. In order to enhance the credibility of the fabricated rape charge and to rebut the anticipated response that her claim was a recent fabrication, Shults arranged in March of 1992 for Chatterton to make a patently false tape recording purporting to be one done in 1988 and in which Chatterton would falsely claim she had been raped by McMahon. The unlawful purpose of this scheme was to make it appear as if Chatterton had actually claimed in 1988 that she had been raped, when in truth and fact she had not been raped and had not so claimed when asked in 1988.

24. In furtherance of this fraudulent scheme, Shults directed Toce to go to a hotel in Connecticut on or about March 19, 1992 to "interview" Chatterton for a second time. Shults instructed Toce to hide two tape recorders in the room and keep both recorders on at all times. The third tape recorder was to be the only one seen by Chatterton and it was to be turned on and off as the fabricated tape was made. The concealed tape recorders were designed to pick

up everything said in the room, even when Chatterton believed she was not being recorded by the visible recorder.

25. On or about March 19, 1992, Chatterton, Shults and Toce conducted the fraudulent "interview" and manufactured an audio tape which was made to sound as if it had been recorded in 1988. During the course of this bogus "interview," Skulski placed a call to the hotel room where the "interview" was taking place. The purpose of Skulski's call was to make arrangements with Shults to have Chatterton brought to New York City to meet with various agents of Rivera, Tribune and/or News Group in the ensuing days.

26. On the same date upon which the bogus "interview" was conducted, a caller who identified himself as being affiliated with a "T.V. Show" contacted Titan and informed a Titan employee that he possessed three, thirty minute tapes of a former referee named "Rita Marie" in which "Rita Marie" said some "pretty nasty things" about McMahon that were to be broadcasted on "National T.V. pretty soon." The caller asked if Titan would like to "buy" the tapes.

27. Titan refused to participate in this blackmail scheme. At the time of this call, Titan, McMahon and the WWF had no knowledge of the fabricated "interview" between Toce and Chatterton conducted earlier that day.

28. Immediately after the tapes had been manufactured, Shults arranged for Chatterton to travel to New York to meet with agents of Rivera, Tribune and/or News Group. Upon information and belief, Rivera, Tribune and/or News Group, through their agents, offered

to pay and provided other consideration to Shults and/or Chatterton for her fabricated "story."

29. On or about March 20, 1992, agents of Rivera, Tribune, and/or News Group saw to it that Chatterton spoke to an attorney selected and controlled by Rivera, Tribune and/or News Group. Chatterton was one of three persons appearing in the eventual *Now It Can Be Told* episode who were sent to lawyers selected and controlled by Rivera, Tribune and/or News Group.

30. On March 23, 1992, Lisa Pelosi ("Pelosi"), a lawyer in the network controlled by Rivera, Tribune and/or News Group, contacted Titan to discuss Chatterton's "claim." This March 23, 1992 telephone call by Pelosi was the first time that Chatterton had ever made a claim against McMahon and was made in the midst of *Now It Can Be Told's* production of the story. Moreover, this call was made despite Pelosi's knowledge that the "claim" was time-barred when first raised and, as such, had no legal value whatsoever.

31. Shortly after her initial call, Lisa Pelosi's connections to Rivera, Tribune and/or News Group became known and she was immediately replaced.

32. Several days later, Chatterton came to be represented by Robert Wolf ("Wolf"), another attorney within the network of attorneys controlled by Rivera, Tribune and/or News Group.

33. Despite the fact that Chatterton's "claim" was of absolutely no legal effect, Chatterton's "counsel" demanded five million (\$5,000,000.00) dollars to "settle" Chatterton's claim.

34. Titan was told by Chatterton's counsel, all of whom in reality were accountable to and controlled by Rivera, that Chatterton would "waive her First Amendment right" to speak out live on *Now It Can Be Told* in return for the aforementioned \$5,000,000.00.

35. McMahon refused to offer or pay any sums whatsoever to Chatterton or her attorneys.

36. On or about March 25, 1992, Titan learned about the fabrication of the tapes involving Chatterton, Shults and Toce.

37. As soon as McMahon and Titan became apprised of Chatterton's false claim, the fabricated "interview," the blackmail attempts and the use of lawyers controlled by Rivera, Tribune and/or News Group to "represent" new found victims in the midst of developing a show, Titan contacted Charles Sennet ("Sennet"), the General Counsel of Tribune Broadcasting Company, Tribune's parent company, and specifically apprised him of these matters.

38. Sennet contacted Skulski and informed her that Titan was aware that Shults and Chatterton had unlawfully fabricated evidence to support Chatterton's claim.

39. Skulski, in turn, contacted Shults and told him that the details of the fabricated "interview" were known to Titan. Skulski asked Shults to secure a sworn affidavit from Chatterton that the phony tapes were actually made in 1988.

40. At various times between March 25, and April 3, 1992, Titan repeatedly provided Sennet with truthful information regarding Chatterton's allegations. Citing supposed "production

deadlines," Sennet refused to disavow an intent to broadcast Chatterton's accusation of rape against McMahon.

41. On or about April 3, 1992, the *Now It Can Be Told* episode aired. The show was hosted by Rivera and featured Craig Rivera (Geraldo's brother) as a "reporter," and was entitled "Wrestling's Ring of Vice."

42. In the beginning part of the program, heavy emphasis was placed on the two other persons also referred to the legal network controlled by Rivera, Tribune and News Group. The theme of this portion of the program was that persons other than Mr. McMahon had engaged in some form of sexual misconduct.

43. After a commercial break, Rivera introduced Chatterton by stating that she was going to "point the finger directly at the ruler of the World Wrestling Federation himself, directly at Vince McMahon."

44. During that same program, Craig Rivera stated that "Rita Marie is the only player in the WWF scandal to level charges of sexual harassment directly at McMahon," despite the knowledge of both Rivera and Craig Rivera that Chatterton was not making a charge of "sexual harassment," but was instead going to tell a false and malicious story about being raped.

45. During that April 3, 1992 edition of *Now It Can Be Told*, Chatterton stated that McMahon "made me have oral sex with him," and that he "started pulling my pants off, and he pulled me on top of him, and he satisfied himself through intercourse," thereby

making it clear to all viewers that her allegation was that McMahon had raped her.

46. During that program, and after publishing Chatterton's fabricated allegations, Rivera attempted to bolster the credibility of Chatterton's fabricated charges by innuendo that Titan and/or McMahon were trying to settle these claims in discussions with Chatterton's "counsel," thereby giving the false appearance of legal legitimacy to her claims.

47. Rivera and Tribune at no time, however, reported that Chatterton's attorneys were obtained by and accountable to Rivera; that Chatterton had tried to use the leverage of not telling her story live to justify her extortionate demands; that Chatterton's offer to "waive her First Amendment right to speak out" for \$5,000,000.00 was what she was specifically discussing with counsel for McMahon; that McMahon refused to offer any sums whatsoever to her; or that the whole story had been orchestrated by him and his agents all along.

48. At the close of the April 3, 1992 episode of *Now It Can Be Told*, and after airing both Chatterton's fabricated claim of rape and the false innuendo that McMahon was trying to settle her claim to avoid bad publicity, Rivera compounded this false innuendo by waving what he said were "dozens of pages of legal documents, allegations, threats, and bluster sent our way in an attempt to scare us off and prevent this investigation from airing." During this speech, Rivera waived before the camera the very letters which provided Sennet with truthful information regarding Chatterton's

allegations and which also disclosed the fabrication of evidence and use of Rivera's lawyers to extort money from McMahon. Having waved the letters containing the truth on screen in a deceptive effort to imply that McMahon was trying to stop the truth from airing, Rivera closed the program by proclaiming that "there is no lawyer on this planet that can stop me...."

49. Not being satisfied with only one broadcast of the allegations which they had so carefully, but unlawfully, orchestrated, Rivera, Tribune and/or News Group permitted Chatterton to again express her false allegations against McMahon on the April 10, 1992 episode of *The Geraldo Rivera Show*.

50. On the April 10, 1992 edition of *The Geraldo Rivera Show*, Chatterton expressly accused McMahon of "rape." Although Chatterton could be visibly seen on screen mouthing the word "rape," the audio portion was contemporaneously edited to delete the word "rape."

51. The editors removed "rape" from the audio track of the program, and instead superimposed a message on the screen which stated that McMahon "forced" Chatterton to have sexual relations with him. Despite this curious bit of editing, and perhaps because of it, all who viewed the April 10, 1992 edition of *The Geraldo Rivera Show* were made plainly aware that Chatterton accused McMahon of rape. Moreover, those persons in attendance at the taping of the show clearly heard Chatterton state that she was "raped" by McMahon.

52. Throughout the entire course of the above-described events, Rivera, Skulski, Tribune, News Group, Chatterton, Shults and their agents, all acted together in concert for the purpose of disseminating, on a national basis, false, malicious and extortionate allegations of rape against McMahon.

53. After the above-described episodes of *Now It Can Be Told* and *The Geraldo Rivera Show* were broadcasted, Chatterton's fabricated story of McMahon raping her was republished by the print media.

54. After the two programs aired, neither Wolf nor Chatterton were heard from again by Titan or the McMahons. No lawsuit was ever filed. Wolf announced he was dropping Chatterton as a "client" because her claim was time-barred, a fact which had been well known to him at the inception of his "representation."

COUNT ONE: (Intentional Infliction of
Emotional Distress against Rivera)

1. Paragraphs one through 54 above are hereby incorporated and made Paragraphs one through 54 of Count One.

55. Rivera, Skulski, Tribune, News Group, Chatterton and Shults knowingly commissioned, fabricated, manufactured and/or broadcasted false accusations of rape against McMahon and attempted to legitimize the allegations by engaging in extortionate conduct directed at McMahon, all with the specific intent and effect of inflicting severe emotional harm upon McMahon.

56. Alternatively, Rivera, Skulski, Tribune, News Group, Chatterton, and Shults knowingly commissioned, fabricated,

manufactured and/or broadcasted false accusations of rape against McMahon and attempted to legitimize the accusations by engaging in outrageous and extortionate conduct directed at McMahon with knowledge that their conduct was likely to cause McMahon to endure severe emotional distress.

57. At all times relevant hereto, the Defendants acted with actual malice, i.e., with knowledge that Chatterton's accusations were false and/or with reckless disregard as to whether or not they were true.

58. By commissioning, fabricating, manufacturing and/or broadcasting false accusations of rape against McMahon, and by attempting to falsely legitimize the allegations by engaging in extortionate conduct directed at McMahon, Rivera, Skulski, Tribune, News Group, Chatterton and Shults engaged in extreme and outrageous conduct which exceeds all bounds tolerated by any decent society.

59. Rivera's, Skulski's, Tribune's, News Groups', Chatterton's and Shults' conduct was especially calculated to cause, and indeed did cause, McMahon to suffer severe emotional distress.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of Rivera as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's

companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT TWO: (Intentional Infliction of Emotional Distress
Against Skulski)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Two.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of Skulski as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to, severe mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered extreme emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT THREE: (Intentional Infliction of Emotional Distress
Against Tribune)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Three.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of Tribune as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to, severe mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT FOUR: (Intentional Infliction of Emotional Distress
Against News Group)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Four.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of News Group as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to, severe mental

anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT FIVE: (Intentional Infliction of Emotional Distress
Against Chatterton)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Five.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of Chatterton as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to, severe mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT SIX: (Intentional Infliction of Emotional Distress
Against Shults)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Six.

60. As a direct and proximate result of the intentional, outrageous and malicious acts of Shults as described herein, Plaintiff McMahon has suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

61. As a direct and proximate result of the injuries to her husband, Plaintiff Mrs. McMahon has been denied McMahon's companionship, affection and moral support. Furthermore, Mrs. McMahon has likewise suffered severe emotional distress and/or other injuries including, but not limited to, mental anguish, anger, embarrassment, shame, humiliation, depression, and loss of sleep.

COUNT SEVEN: (Civil Conspiracy Against Rivera)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Seven.

60. Rivera, Skulski, Tribune, News Group, Chatterton and Shults joined together for the unlawful purpose of falsely and maliciously accusing McMahon of rape, using the leverage of that false accusation in an attempt to extort money from McMahon, and inflicting severe emotional distress on Mr. McMahon.

61. Rivera, Skulski, Tribune, News Group, Chatterton and Shults acted pursuant to an agreement to conspire in order to falsely and maliciously accuse McMahon of rape, using the leverage of that false accusation in an attempt to extort money from McMahon, and to inflict severe emotional distress on Mr. McMahon.

62. In furtherance of this conspiracy, Rivera, *inter alia*, enabled Chatterton to make false accusations against McMahon on two nationally syndicated television programs, assisted Chatterton in falsely accusing McMahon of rape by making disparaging statements against McMahon, Titan and the WWF in the context of Chatterton's allegations and attempted to legitimize Chatterton's false accusation of rape against McMahon by implying that Titan's lawyers were trying to cover up Chatterton's allegations.

63. As a consequence of the conspiracy between Rivera and the various Defendants as hereinbefore described, Plaintiffs have been caused to suffer damages, including the severe emotional distress as hereinbefore alleged.

COUNT EIGHT: (Civil Conspiracy Against Skulski)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Eight.

60. Paragraphs 60 and 61 of Count Seven are hereby incorporated and made Paragraphs 60 and 61 of Count Eight.

62. In furtherance of this conspiracy, Skulski, *inter alia*, worked directly with Shults in connection with the fabrication of phony taped interviews designed to bolster Chatterton's false

charges, assisted Shults in maintaining the secrecy of the fabricated audiotaped "interview" between Chatterton and Toce and produced the episode of *Now It Can Be Told* on which Chatterton levied her false accusation of rape against McMahon.

63. As a consequence of the conspiracy between Shults and among the various Defendants as hereinbefore described, Plaintiffs have been caused to suffer damages including the severe emotional distress as hereinbefore alleged.

COUNT NINE: (Civil Conspiracy Against Tribune)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Nine.

60. Paragraphs 60 and 61 of Count Seven are hereby incorporated and made Paragraphs 60 and 61 of Count Nine.

62. In furtherance of this conspiracy, Tribune, and/or News Group, *inter alia*, contracted with Shults to obtain disparaging statements about McMahon, Titan and the WWF, gave consideration to Chatterton to falsely accuse McMahon of rape on *Now It Can Be Told* and *The Geraldo Rivera Show*, selected and provided lawyers for Chatterton in an attempt to extort McMahon and to give her allegations the appearance of legal legitimacy, and produced and distributed the shows knowing that they contained false and malicious statements.

63. As a consequence of the conspiracy between Tribune and the various Defendants as hereinbefore described, Plaintiffs have

been caused to suffer damages, including the severe emotional distress as hereinbefore alleged.

COUNT TEN: (Civil Conspiracy Against News Group)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Ten.

60. Paragraphs 60 and 61 of Count Seven are hereby incorporated and made Paragraphs 60 and 61 of Count Ten.

62. In furtherance of this conspiracy, News Group and/or Tribune, *inter alia*, contracted with Shults to obtain disparaging statements about McMahon, Titan and the WWF, gave consideration to Chatterton to falsely accuse McMahon of rape on *Now It Can Be Told* and *The Geraldo Rivera Show*, selected and provided lawyers for Chatterton in an attempt to extort McMahon and to give her allegations the appearance of legal legitimacy and produced and distributed the shows knowing that they contained false and malicious statements.

63. As a consequence of the conspiracy between News Group and the various Defendants as hereinbefore described, Plaintiffs have been caused to suffer damages, including the severe emotional distress as hereinbefore alleged.

COUNT ELEVEN: (Civil Conspiracy Against Chatterton)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Eleven.

60. Paragraphs 60 and 61 of Count Seven are hereby incorporated and made Paragraphs 60 and 61 of Count Eleven.

62. In furtherance of this conspiracy, Chatterton, *inter alia*, fabricated accusations of rape against McMahon, which she restated on *Now It Can Be Told* and *The Geraldo Rivera Show*, participated in a fabricated "interview" with Toce and Shults, designed to make it appear that Chatterton initially made her allegations in 1988, and not 1992, and attempted to extort McMahon by demanding millions of dollars not to tell her false story live on the tabloid shows.

63. As a consequence of the conspiracy between Chatterton and the various Defendants as hereinbefore described, Plaintiffs have been caused to suffer damages, including the severe emotional distress as hereinbefore alleged.

COUNT TWELVE: (Civil Conspiracy Against Shults)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Twelve.

60. Paragraphs 60 and 61 of Count Seven are hereby incorporated and made Paragraphs 60 and 61 of Count Twelve.

62. In furtherance of this conspiracy, Shults, *inter alia*, agreed to provide disparaging information about McMahon, Titan and the WWF to Rivera, Tribune and/or News Group; and devised and participated in a fabricated audiotaped "interview" between Toce and Chatterton, in which the latter made it appear that her false allegations of rape against McMahon had been made initially in 1988 when, in fact,

they had not been made at that time; and actively participated in a scheme to extort millions of dollars from Mr. McMahon.

63. As a consequence of the conspiracy between Shults and the various Defendants as hereinbefore described, Plaintiffs have been caused to suffer damages, including the severe emotional distress as hereinbefore alleged.

COUNT THIRTEEN: (Loss of Consortium Against Rivera)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Thirteen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of Rivera, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of Rivera's outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been deprived of McMahon's companionship, society, affection and moral support.

COUNT FOURTEEN: (Loss of Consortium Against Skulski)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Fourteen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of Skulski, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of Skulski's outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been deprived of McMahon's companionship, society, affection and moral support.

COUNT FIFTEEN: (Loss of Consortium Against Tribune).

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Fifteen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of Tribune, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of Tribune's outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been deprived of McMahon's companionship, society, affection and moral support.

COUNT SIXTEEN: (Loss of Consortium Against News Group)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Sixteen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of News Group, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of News Group's

outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been deprived of McMahon's companionship, society, affection and moral support.

COUNT SEVENTEEN: (Loss of Consortium Against Chatterton)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Seventeen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of Chatterton, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of Chatterton's outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been deprived of McMahon's companionship, society, affection and moral support.

COUNT EIGHTEEN: (Loss of Consortium Against Shults)

1. Paragraphs One through 59 of Count One are hereby incorporated and made Paragraphs One through 59 of Count Eighteen.

60. As a consequence of the outrageous, intentional, malicious and extortionate acts of Shults, Mrs. McMahon has suffered severe emotional distress as hereinbefore described.

61. As a consequence of the injuries that McMahon has suffered as a direct and proximate result of Shults' outrageous, intentional, malicious and extortionate acts, Mrs. McMahon has been

deprived of McMahon's companionship, society, affection and moral support.

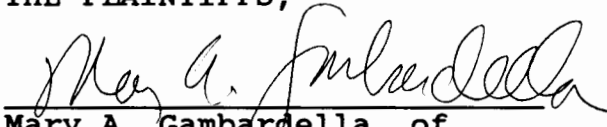
Plaintiffs hereby demand a trial by jury.

WHEREFORE, the Plaintiffs respectfully request that this Court enter Judgment in their favor and award them the following relief:

- a. Compensatory damages in excess of \$50,000.00;
- b. Punitive damages in excess of \$1,000,000.00;
- c. Costs, including reasonable attorneys' fees, incurred in the prosecution of this action; and
- d. Such other and further relief as this Court deems necessary, equitable and proper.

THE PLAINTIFFS,

By:


Mary A. Gambardella, of

Federal Bar #ct05386
EPSTEIN BECKER & GREEN, P.C.
Their Attorneys
Six Landmark Square, Suite 603
Stamford, Connecticut 06901
(203) 348-3737

- and-

Jerry S. McDevitt,
George B. Foster
Nicholas Vari
Steven S. Santoro
Pro Hac Vice Admission Pending,
of KIRKPATRICK & LOCKHART
1500 Oliver Building
Pittsburgh, Pennsylvania 15222
(412) 355-6500